



**Air Quality
TIER II OPERATING PERMIT
And
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: T2-040014

FACILITY ID No.: 001-00029

AQCR: 064

CLASS: SM

SIC: 8062

ZONE: 11

UTM COORDINATE (km): 565.2, 4829.2

1. PERMITTEE

St. Luke's Regional Medical Center, Boise

2. PROJECT

Facility-wide Tier II Operating Permit and Permit to Construct Modification

3. MAILING ADDRESS

140 E. Jefferson Street

CITY

Boise

STATE

ID

ZIP

83712

4. FACILITY CONTACT

Ken Currier

TITLE

Plant Operations Manager

TELEPHONE

(208) 381-2255

5. RESPONSIBLE OFFICIAL

Ken Currier

TITLE

Plant Operations Manager

TELEPHONE

(208) 381-2255

6. EXACT PLANT LOCATION

140 E. Jefferson Street, Boise, Idaho

COUNTY

Ada

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

General Medical and Surgical Hospital

8. PERMIT AUTHORITY

This permit to construct and Tier II operating permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200-228 and IDAPA 58.01.01.400-470, respectively. This permit pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit

The permit to construct conditions in this permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ's) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 *Rules for the Control of Air Pollution in Idaho*.

TONI HARDESTY, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: PROPOSED

DATE EXPIRES: April 2, 2007

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Acronyms, Units, and Chemical Nomenclature

| | |
|------------------------|--|
| acfm | actual cubic feet per minute |
| AFS | AIRS Facility Subsystem |
| AIRS | Aerometric Information Retrieval System |
| AQCR | Air Quality Control Region |
| ASTM | American Society for Testing and Materials |
| CFR | Code of Federal Regulations |
| CO | carbon monoxide |
| DEQ | Idaho Department of Environmental Quality |
| EPA | Environmental Protection Agency |
| gr/dscf | grains per dry standard cubic foot |
| EPA | Environmental Protection Agency |
| gpm | gallons per minute |
| IDAPA | a numbering designation for all administrative rules in Idaho promulgated in accordance with Idaho Administrative Procedures Act |
| km | kilometer |
| kW | kilowatts |
| lb/hr | pounds per hour |
| MMBtu | million British thermal units |
| MM ft ³ /yr | million cubic feet per year |
| NO _x | oxides of nitrogen |
| NSPS | New Source Performance Standards |
| O&M | operations and maintenance |
| PM | particulate matter |
| PM ₁₀ | particulate matter with an aerodynamic diameter of 10 micrometers or less |
| ppm | parts per million |
| PTC | Permit to Construct |
| SLRMC | St. Luke's Regional Medical Center |
| SCC | Source Classification Code |
| scf | standard cubic feet |
| SIC | Standard Industrial Classification |
| SIP | State Implementation Plan |
| SO ₂ | sulfur dioxide |
| T/yr | tons per year |
| μm | micrometers |
| VOC | volatile organic compound |

| AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040014 | | | | |
|--|------------------------------------|----------------------------------|----------------------|-----------------|
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| Location: | Boise, Idaho | | Date Expires: | April 2, 2007 |

1. TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 This Tier II operating permit and permit to construct (PTC) is a modification to the facility's existing permits. This permit increases the natural gas consumption for the facility's four boilers from 133 million cubic feet per year (MM ft³/yr) to 256 MM ft³/yr. In addition, this permit increases each generator's short-term operating hours limit from 45 minutes to four hours per any 24-hour period and each generator's long-term operating hours limit from 60 hours per year (hr/yr) to 208 hr/yr.
- 1.2 This modified Tier II operating permit and PTC replaces the following permits, the term and conditions of which no longer are in effect:
 - Permit to Construct No. P-030063, issued March 26, 2004.
 - Tier II Operating Permit No. 001-00029, issued April 2, 2002.
 - Tier II Operating Permit No. 001-00029, issued August 15, 1996.
 - Permit to Construct No. 001-00029, issued July 28, 1993 and re-issued June 20, 1994.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No. T2-040014

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Regulated Sources

1.3 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

| Permit Section | Source Description | Emissions Control(s) |
|----------------|--|----------------------|
| 2 | Facility-wide (all affected emissions sources) | N/A |
| 3 | <u>Boiler No. 1</u> – Cleaver Brooks Natural gas-fired, ASTM Grade 2 fuel oil backup 29.29 million British thermal units per hour (MMBtu/hr) rated heat input capacity Model:CB200-700, Serial No.: L-61585 | None |
| 3 | <u>Boiler No. 2</u> – Cleaver Brooks Natural gas-fired, ASTM Grade 2 fuel oil backup 29.29 MMBtu/hr rated heat input capacity Model:CB200-700, Serial No.: L-61406 | None |
| 3 | <u>Boiler No. 3</u> – Cleaver Brooks Natural gas-fired, ASTM Grade 2 fuel oil backup 29.29 MMBtu/hr rated heat input capacity Model:CB200-700, Serial No.: L-89707 | None |
| 3 | <u>Boiler No. 4</u> – Cleaver Brooks Natural gas-fired, ASTM Grade 2 fuel oil backup 29.29 MMBtu/hr rated heat input capacity Model:CB200-700, Serial No.: L-89707 | None |
| 4 | <u>Emergency Generator No. 1</u> – Caterpillar Diesel-fired, 900 kilowatts (kW) rated output capacity Model: D399, Serial No.: 35B1379 | None |
| 4 | <u>Emergency Generator No. 2</u> – Caterpillar Diesel-fired, 1050 kW rated output capacity Model: 3512, Serial No.: 24Z1313 | None |
| 4 | <u>Emergency Generator No. 3</u> – Caterpillar Diesel-fired, 2000 kW rated output capacity Model: 3516, Serial No.: 4XF00419 | None |
| 4 | <u>Emergency Generator No. 4</u> – Caterpillar Diesel-fired, 350 kW rated output capacity Model: 3406B, Serial No.: 4RG01205 | None |
| 4 | <u>Emergency Generator No. 5</u> – Caterpillar Diesel-fired, 65 kW rated output capacity Model: 3304, Serial No.: 83Z02429 | None |
| 4 | <u>Emergency Generator No. 6</u> – Caterpillar Diesel-fired, 105 kW rated output capacity Model: 3304, Serial No.: 4B10118 | None |
| 4 | <u>Emergency Generator No. 7</u> – Caterpillar Diesel-fired, 2000 kW rated output capacity Model: 3516B, Serial No.: 4XF00419 | None |

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2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne, in accordance with IDAPA 58.01.01.650-651.

[PTC Condition]

Visible Emissions

- 2.2 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[PTC Condition]

- 2.3 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[PTC Condition]

Excess Emissions

- 2.4 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[PTC Condition]

Fuel-Burning Equipment

- 2.5 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas or 0.05 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid fuel.

[PTC Condition]

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Air Stagnation Advisory Days

- 2.6 The permittee shall comply with IDAPA 58.01.01.550-562, *Air Pollution Emergency Rule*.
[PTC Condition]

Sulfur Content

- 2.7 No ASTM Grade 2 fuel oil containing sulfur in excess of 0.5% by weight shall be burned at the facility.
[PTC Condition]
- 2.8 The permittee shall maintain purchase records, or equivalent, from the manufacturer or distributor that shows the sulfur content of the fuel oil delivered to the facility. Records shall be maintained in accordance with Permit Condition 2.9.
[PTC Condition]

Monitoring and Recordkeeping

- 2.9 The permittee shall maintain sufficient record keeping to assure compliance with the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.
[PTC Condition]

Reports and Certifications

- 2.10 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 North Orchard
Boise, ID 83706-2239

[PTC Condition]

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3. BOILERS NOS. 1, 2, 3, AND 4**3.1 Process Description**

There are four identical Cleaver Brooks boilers existing at SLRMC, each rated at the same heat input capacity of 29.29 MMBtu/hr. The stack parameters are the same for each boiler. Each boiler may operate using either natural gas fuel or ASTM Grade 2 fuel oil. The primary purpose of the boilers is to generate steam for space heating at the hospital.

Boilers Nos. 3 and 4 are subject to New Source Performance Standard (NSPS), Subpart Dc. After modification, Boilers Nos. 1 and 2 will be subject to NSPS rules.

3.2 Control Description

Emissions from the boilers are uncontrolled.

Emissions Limits**3.3 Emissions Limits**

The emissions of particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM₁₀), carbon monoxide (CO), nitrogen oxides (NO_x), and sulfur oxides (SO₂) from the boiler's stacks shall not exceed any corresponding emissions rate limits listed in Table 3.1.

Table 3.1 EMISSIONS LIMITS FOR BOILERS OPERATING ON ASTM GRADE 2 FUEL OIL

| Source | PM ₁₀ | | CO | | NO _x | | SO ₂ | |
|--|------------------|------|-------|------|-----------------|------|-----------------|------|
| | lb/hr | T/yr | lb/hr | T/yr | lb/hr | T/yr | lb/hr | T/yr |
| Boiler No. 1 | 0.42 | | 1.05 | | 4.2 | | 14.86 | |
| Boiler No. 2 | 0.42 | | 1.05 | | 4.2 | | 14.86 | |
| Boiler No. 3 | 0.42 | | 1.05 | | 4.2 | | 14.86 | |
| Boiler No. 4 | 0.42 | | 1.05 | | 4.2 | | 14.86 | |
| Boilers Combusting ASTM Grade 2 Fuel Oil | | 0.27 | | 0.68 | | 2.72 | | 9.64 |

[PTC Condition]

3.4 Visible Emissions Limit

A person shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[PTC Condition]

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Operating Requirements

3.5 Allowable Fuel Types for Boilers Nos. 1, 2, 3, and 4

The primary fuel for Boilers Nos. 1, 2, 3, and 4 shall be natural gas. The secondary fuel shall be ASTM Grade 2 fuel oil.

[PTC Condition]

3.6 Natural Gas Combustion Limit

The maximum amount of natural gas combusted in Boilers Nos. 1, 2, 3, and 4 shall not exceed 256 million standard cubic feet per any consecutive 12-month period.

3.7 Number of Boilers That Can Operate When Combusting ASTM Grade 2 Fuel Oil

Only one of the four boilers may be operated at a time while combusting ASTM Grade 2 fuel oil.

[PTC Condition]

3.8 Boiler Daily Hours of Operation When Combusting ASTM Grade 2 Fuel Oil

When combusting ASTM Grade 2 fuel oil, no boiler shall be operated for more than 10 hours in any 24-hour period.

[PTC Condition]

3.9 Boilers Annual Hours of Operation When Combusting ASTM Grade 2 Fuel Oil

When combusting ASTM Grade 2 fuel oil, boiler hours of operation in aggregate shall not exceed 1,298 hours per any consecutive 12-month period.

[PTC Condition]

Monitoring and Recordkeeping Requirements

3.10 Natural Gas Fuel Combustion

The permittee shall monitor and record monthly and annually the total amount of natural gas combusted in Boilers Nos. 1, 2, 3, and 4 to demonstrate compliance with Permit Condition 3.6. Records of this information shall be maintained in accordance with Permit Condition 2.9.

[PTC Condition]

3.11 Operation When Combusting ASTM Grade 2 Fuel Oil

The permittee shall monitor and record the following information to demonstrate compliance with Permit Conditions 3.7, 3.8, and 3.9. Records of this information shall be maintained in accordance with Permit Condition 2.9.

- The date and the identity of the boiler combusting the fuel oil
- The date, the start time, the stop time, and a summation of the number of hours the boiler operated in any 24-hour period and any consecutive 12-month period.

[PTC Condition]

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3.12 Fuel Type and Amount Combusted in Boilers Nos. 1, 2, 3, and 4

Unless EPA specifies a different time period for recordkeeping, the permittee shall record and maintain records, for the most recent five year period, of the amounts of fuel combusted in each boiler during each day, as required in 40 CFR 60.48c(g).

Reporting Requirements

3.13 NSPS Report for Boilers Nos. 1, 2, 3, and 4

- Boilers Nos. 3 and 4: The permittee shall submit to DEQ and to the Environmental Protection Agency (EPA) an annual report no later than 30 days after the end of the calendar year. The report shall include records of fuel supplier certification containing 1) the name of the oil supplier, and 2) a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c. The report shall include a statement signed by the permittee that the records of fuel supplier certifications submitted represent all the fuel oil combusted during the period.

[40 CFR 60.48c; PTC Condition]

- Boilers Nos. 1 and 2: Unless EPA specifies a different reporting period, the permittee shall submit to DEQ and to EPA a semi-annual report that shall be postmarked by the 30th day following the end of the reporting period. The report shall include records of fuel supplier certification containing 1) the name of the oil supplier, and 2) a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c. The report shall include a statement, signed by the permittee, that the records of fuel supplier certifications submitted represent all the fuel oil combusted during the period.

[40 CFR 60.48c]

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4. EMERGENCY GENERATORS NOS. 1, 2, 3, 4, 5, 6, AND 7

4.1 Process Description

There are seven Caterpillar diesel-fired emergency generators existing at SLRMC. The generators' model numbers, rated output capacities, and serial numbers are shown in Table 1.1 of this permit.

The primary purpose of the emergency generators is to provide electrical power to the hospital in the event of a power interruption.

4.2 Emissions Control Description

Emissions from the emergency generators are uncontrolled.

Emissions Limits

4.3 Visible Emissions Limit

A person shall not discharge any air pollutant into the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[PTC Condition]

4.4 Fuel Sulfur Content

No ASTM Grade 2 fuel oil containing sulfur in excess of 0.5% by weight shall be burned in the emergency generators.

[PTC Condition]

Operating Requirements

4.5 Hours of Operation for Maintenance

- The operation of each emergency generator shall not exceed a maximum of four hours in any 24-hour period. This limit shall not apply during times of electric power outages to the hospital.
- The operation of each emergency generator shall not exceed a maximum of 208 hours in any consecutive 12-month period. This limit shall not apply during times of electric power outages to the hospital.

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Monitoring and Recordkeeping Requirements

4.6 Emergency Generator Operation

The permittee shall monitor and record the date, number of hours of operation, and the reason for the operation of each emergency generator. Records of this information shall be maintained in accordance with Permit Condition 2.9.

[PTC Condition]

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5. SUMMARY OF EMISSION RATE LIMITS

Table 5.1 provides a summary of all emissions rate limits required by this permit.

SAINT LUKE'S REGIONAL MEDICAL CENTER – BOISE

Table 5.1
EMISSIONS LIMITS^a HOURLY (LB/HR)^b AND ANNUAL^c (T/YR)^d
FOR BOILERS OPERATING ON ASTM GRADE 2 FUEL OIL

| Source | PM ₁₀ | | CO | | NO _x | | SO ₂ | |
|--|------------------|------|-------|------|-----------------|------|-----------------|------|
| | lb/hr | T/yr | lb/hr | T/yr | lb/hr | T/yr | lb/hr | T/yr |
| Boiler No. 1 | 0.42 | | 1.05 | | 4.2 | | 14.86 | |
| Boiler No. 2 | 0.42 | | 1.05 | | 4.2 | | 14.86 | |
| Boiler No. 3 | 0.42 | | 1.05 | | 4.2 | | 14.86 | |
| Boiler No. 4 | 0.42 | | 1.05 | | 4.2 | | 14.86 | |
| Boilers Combusting ASTM Grade 2 Fuel Oil | | 0.27 | | 0.68 | | 2.72 | | 9.64 |

^a As determined by a pollutant-specific EPA reference method, a DEQ-approved alternative, or by DEQ's emissions estimation methods used in the permit application analysis.

^b Pounds per hour

^c As determined by multiplying the actual or allowable (if actual is not available) pounds per hour emissions rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

^d Tons per consecutive 12-month period

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6. PERMIT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the *Rules for the Control of Air Pollution in Idaho*. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

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All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.